

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

RECEIVER'S EXHIBIT LIST

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

EXHIBIT LIST

Case No.: 1:24-cv-00040-EAW-MJR () **Plaintiffs**
Date: January 23-24, 2025 () **Defendants**
(X) **Receiver**

The Receiver submits the following list of exhibits in advance of the evidentiary hearing scheduled for January 23 and 24, 2025. The Receiver reserves the right to timely amend this list as necessary.

Exhibits REC001 to REC089 below have previously been filed with the Court by the parties or the Receiver in the pleadings related to the Order to Show Cause re Contempt or Fidelis's Motion Challenging Receivership Defendant Determination. Exhibits REC090 to REC102 below have not previously been filed with the Court.

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC001	Wall Declaration in Support of Receiver's Emergency Motion for an Order to Show Cause Why Receivership Defendant Lit Def Strategies, LLC and Individual Defendant Jason Blust Should Not Be Held in Civil Contempt	179-02			
REC002	Wall Dec., Ex. 1: Nevada Secretary of State's Business Information Page for Fidelis	179-03			
REC003	Wall Dec., Ex. 2: Printout of Fidelis's website	179-04			
REC004	Wall Dec., Ex. 3: Printout of Lit Def's website	179-05			
REC005	Wall Dec., Ex. 4: Sample of Fidelis emails that were located in the StratFS Salesforce environment	179-06			
REC006	Wall Dec., Ex. 5: October 26-27, 2021 email string regarding Fidelis	179-07			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC007	Wall Dec., Ex. 6: October 28-29, 2021 email string concerning Fidelis invoicing	179-08			
REC008	Wall Dec., Ex. 7: October 28-November 30, 2021 email string regarding Fidelis invoicing	179-09			
REC009	Wall Dec., Ex. 8: March 8-24, 2022 email string concerning Fidelis invoicing along with a related contract	179-10			
REC010	Wall Dec., Ex. 9: Sample of pre-February 2022 Lit Def emails that were located in the StratFS Salesforce environment	179-11			
REC011	Wall Dec., Ex. 10: Sample of post-February 2022 Lit Def emails that were located in the StratFS Salesforce environment	179-12			
REC012	Wall Dec., Ex. 11: January 31, 2024 email string located in the StratFS Salesforce environment	179-13			
REC013	Wall Dec., Ex. 12: January 31, 2024 email string from StratFS's servers having a subject line including the description "File #116026404"	179-14			
REC014	Wall Dec., Ex. 13: January 22, 2024 email from StratFS's servers sent by a Senior Vice President of StratFS	179-15			
REC015	Christo Declaration in support of Non-Party Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination That Fidelis is a Receivership Defendant	190-04			
REC016	Christo Dec., Ex. A: Fidelis Operating Agreement	190-05			
REC017	Christo Dec., Ex. B: Ownership Transfer to the Bush Lake Trust	190-06			
REC018	Christo Dec., Ex. C: Bush Lake Trust Agreement	190-07			
REC019	Christo Dec., Ex. D: Example of Fidelis Invoice	190-08			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC020	Christo Dec., Ex. E: Letter from Receiver re: Status of Fidelis as Receivership Defendant (February 25, 2024)	190-09			
REC021	Christo Dec., Ex. F: Exemplar Reminders to Fidelis Customer Support Staff	190-10			
REC022	Declaration of Jason Blust	211-00			
REC023	Rosenberg Declaration in Support of Receiver's Opposition to Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination That Fidelis is a Receivership Defendant	212-01			
REC024	Rosenberg Dec., Ex. A: True and correct copy of a chat conversation including those instructions from Shirley Saavedra	212-02			
REC025	Wall Declaration in Support of Receiver's Opposition to Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination That Fidelis is a Receivership Defendant	212-03			
REC026	Wall Dec., Ex. 1: Printout of the front page of Client First Bankruptcy website	212-04			
REC027	Wall Dec., Ex. 2: November 2, 2023 email from Jason Blust with the subject line "Fw: Monarch discovery punch list"	212-05			
REC028	Wall Dec., Ex. 3: Consent Order of Discipline in the matter of The North Carolina State Bar v. Daniel S. Rufty, North Carolina State Bar No. 20 DHC 17 (Apr. 8, 2021).	212-06			
REC029	Wall Dec., Ex. 4: Invoices for "Fidelis Legal Support LLC" from October 2021 through June 2022, which were located on StratFS's servers.	212-07			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC030	Wall Dec., Ex. 5: March 16-24, 2022 email thread concerning Fidelis invoices	212-08			
REC031	Wall Dec., Ex. 6: November 30, 2021 email thread concerning Fidelis invoices	212-09			
REC032	Wall Dec., Ex. 7: October 26-27, 2021 email thread with the subject line "Re: Technology"	212-10			
REC033	Wall Dec., Ex. 8: Illinois Secretary of State's Business Entity Information page for Turnbull Law Group, LLC	212-11			
REC034	Wall Dec., Ex. 9: Illinois Secretary of State's Business Entity Information page for the Law Office of Jason Blust, LLC	212-12			
REC035	Wall Dec., Ex. 10: New Jersey Secretary of State's Business Entity Information page for Turnbull Law Group NJ, LLC	212-13			
REC036	Wall Dec., Ex. 11: January 3, 2023 email thread concerning Turnbull Law	212-14			
REC037	Wall Dec., Ex. 12: March 16, 2022 email thread concerning invoices for legal services	212-15			
REC038	Wall Dec., Ex. 13: Expense ledger attached to March 16, 2022 email	212-16			
REC039	Wall Dec., Ex. 14: Lobbying Services Agreement dated December 2018, which was located on StratFS's servers	212-17			
REC040	Wall Dec., Ex. 15: Alaska Secretary of State's Certificate of Registration for Chabner Legal Group LLC.	212-18			
REC041	Wall Dec., Ex. 16: October 28-29, 2021 email thread concerning invoices from Arc Strategies, LLC	212-19			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC042	Wall Dec., Ex. 17: May 25-26, 2021 email thread	212-20			
REC043	Christo Declaration in Support of Combined Reply Memorandum in Further Support of Nonparty Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination That Fidelis is a Receivership Defendant	233-01			
REC044	Christo Dec., Ex. G: Sampling of emails from 2021 to 2024 reflecting Christo's day-to-day work operation of Fidelis	233-02			
REC045	Christo Dec., Ex. H: Emails showing employees switching from their Lit Def email account to their Fidelis email account to match the servicer of the file in question	233-03			
REC046	Christo Dec., Ex. I: Email from Christo to Hinds re: delay in payroll processing	233-04			
REC047	Hinds Declaration in Support of Combined Reply Memorandum in Further Support of Nonparty Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination That Fidelis is a Receivership Defendant	233-05			
REC048	Hinds Dec., Ex. A: Email thread re: separate Fidelis and Lit Def email accounts (February 2-11, 2022)	233-06			
REC049	Hinds Dec., Ex. B: Selected emails re: Christo's involvement in management and other meetings	233-07			
REC050	Hinds Dec., Ex. C: Selected emails re: Christo's involvement in operations and procedures	233-08			
REC051	Hinds Dec., Ex. D: Selected emails re: Christo's involvement in hiring and human resources	233-09			
REC052	Hinds Dec., Ex. E: Selected emails re: Christo's involvement in billing	233-10			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC053	Hinds Dec., Ex. F: Email from Hinds to Rosenberg (February 7, 2024)	233-11			
REC054	Hinds Dec., Ex. G: Email from Rosenberg to Hinds re: administrative leave (February 8, 2024)	233-12			
REC055	Hinds Dec., Ex. H: Email from Hinds to Fidelis personnel re: Rosenberg's administrative leave (February 8, 2024)	233-13			
REC056	Hinds Dec., Ex. I: Email from Rosenberg to Hinds re: quitting job (March 8, 2024)	233-14			
REC057	Hinds Dec., Ex. J: Email from Hinds to Rosenberg re: termination (March 12, 2024)	233-15			
REC058	Hinds Dec., Ex. K: Email from Hinds to Fidelis personnel re: Rosenberg's departure (March 12, 2024)	233-16			
REC059	Hinds Dec., Ex. L: Email from Rosenberg to Hinds re: final paycheck and other departure-related issues (March 18, 2024)	233-17			
REC060	Wall Dec., Ex. A: January 11, 2022 email having the subject line "Follow Up", which was located in Michelle Hinds's Lit Def email account	237-03			
REC061	Wall Dec., Ex. B: January 11-12, 2022, email thread having the subject line "Re: Follow Up"	237-04			
REC062	Wall Dec., Ex. C: Exemplar emails transmitting "File Submission Reports" from December 2022, December 2023, and January 2024 to Jason Blust	237-05			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC063	Wall Dec., Ex. D: Email thread dated April 18-19, 2022 having the subject line “Re: File Submission Report”	237-06			
REC064	Wall Dec., Ex. E: Email thread dated May 16-20, 2022 having the subject line “Re: File Submission Report”	237-07			
REC065	Wall Dec., Ex. F: January 18, 2022, email thread having the subject line “Re: Katherine Rosenberg Comp”	237-08			
REC066	Wall Dec., Ex. G: August 5, 2022 email having the subject line “Comp Question”	237-09			
REC067	Wall Dec., Ex. H: December 12-13, 2022 email thread having the subject line “Re: Bonus”	237-10			
REC068	Wall Dec., Ex. I: Katherine Rosenberg’s December 16, 2022 pay stub from Fidelis	237-11			
REC069	Wall Dec., Ex. J: December 14, 2022 email having the subject line “Fidelis/LDS and Amanda White Oak”	237-12			
REC070	Wall Dec., Ex. K: February 22, 2023 email thread having the subject line “Fw: LDS and Fidelis Updates”	237-13			
REC071	Wall Dec., Ex. L: December 8, 2023 email having the subject line “Bonus”	237-14			
REC072	Wall Dec., Ex. M: November 28, 2023 email having the subject line “Re: EOY”	237-15			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC073	Wall Dec., Ex. N: Katherine Rosenberg's December 20, 2023 pay stub from Fidelis, which Ms. Rosenberg provided to the Receiver	237-16			
REC074	Wall Dec., Ex. O: Exemplar Fidelis invoices to Chabner Legal, Guidestone Law Group, Hallock & Associates, and Spring Legal	237-17			
REC075	Wal Dec., Ex. P: January 14, 2024 having the subject line "Ny"	237-18			
REC076	Wall Declaration in Support of Receiver's Further Filing in Opposition to Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination That Fidelis Is a Receivership Defendant	270-01			
REC077	Wall Dec., Ex. Q: April 2, 2021 email thread having the subject line "CHARLES"	270-02			
REC078	Wall Dec., Ex. R: February 9-15, 2022, email thread having the subject line "RE: 12/25 - 2/8"	270-03			
REC079	Wall Dec., Ex. S: email thread having the subject line "Re: New Project: Settlement Entry and File Close in Lit Defense System" from January 11-21, 2022	270-04			
REC080	Wall Dec., Ex. T: email thread dated March 14, 2022, having the subject line "Re: File Submission Report"	270-05			
REC081	Wall Dec., Ex. U: Email thread dated December 21, 2022, having the subject line "Re: Tasks"	270-06			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC082	Wall Dec., Ex. V: December 13, 2022, email thread having the subject line “Hayfa Bonus”	270-07			
REC083	Wall Dec., Ex. W: February 10, 2023 email having the subject line “Shirley”	270-08			
REC084	Wall Dec., Ex. X: April 5, 2023 email thread having the subject line “RE: 2023 Holiday Calendar”	270-09			
REC085	Christo Declaration in Support of Non-Party Fidelis Legal Support Services, LLC’s Combined Response to the Receiver’s Sur-Reply and Supplemental Memoranda	320-01			
REC086	Christo Dec., Ex. J: Exemplar email from Christo to Javier Avila re: Fidelis monthly invoices (July 12, 2023)	320-02			
REC087	Hinds Declaration in Support of Non-Party Fidelis Legal Support Services, LLC’s Combined Response to the Receiver’s Sur-Reply and Supplemental Memoranda	320-03			
REC088	Supplemental Declaration of Counsel for Jason Blust and Lit Def Strategies, LLC	323-00			

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC089	Personius Dec., Ex. A: Annotated calendar for January 2024; Ex. B: Email exchange between Receiver's counsel and Personius (January 24-25, 2024); Ex. C: Letter to the Court (February 9, 2024, Dkt. No. 149); Ex. D: Letter from Receiver's counsel to Personius re: request for information (March 15, 2024); Ex. E: Email exchanges between Receiver's counsel and Personius (March 18-25, 2024); Ex. F: Three emails in response to Receiver's request for information (March 20, 2024); Ex. G: Email thread re: production of additional information (March 25-26, 2024); Ex. H: Email thread re: issues with respect to produced data (March 27 and 29, 2024)	323-01			
REC090	Jason Blust Deposition Transcript (January 29, 2024)				
REC091	Text messages between Christo and Hinds (Fidelis 01261-01284)				
REC092	Fidelis email thread, January 3, 2022 (Fidelis 001032)				
REC093	Fidelis email thread, December 12-14, 2022 (Fidelis 001232)				
REC094	Wall Dec., Ex. 1: December 12-13, 2022 email thread having the subject line "Re: Bonus"				
REC095	Wall Dec., Ex. 2: April 3, 2023 email				
REC096	Wall Dec., Ex. 3: October 31, 2023 email having the subject line "Jenni Moy Raise Request"				
REC097	Wall Dec., Ex. 4: December 4, 2023 email thread having the subject line "Re: Employees"				
REC098	Wall Dec., Ex. 5: Confidential Settlement Agreement and Mutual Release, August 31, 2021				

Ex. No.	Description	ECF No.	Date Offered	Marked	Admitted
REC099	Wall Dec., Ex. 6: March 14-22, 2022 email thread having the subject line “RE: Audit – Carolina settlement”				
REC100	Wall Dec., Ex. 7: March 17-23, 2022 email thread having the subject line “RE: Carolina Settlement 1.5M”				
REC101	Wall Dec., Ex. 8: December 27, 2021 email thread having the subject line “RE: 2021 Law Firm Bills”				
REC102	Support of Receiver’s Hearing Brief				

Dated: January 16, 2025

Respectfully submitted,

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By: /s/ Logan D. Smith

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